July 27, 2017

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: *Exploring Flexible Use in Mid-Band Spectrum Between 3.7 GHz and 24 GHz*, **GN Docket 17-183;**
Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700 – 4200 MHz Band, **RM-11791;**
Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, **WT Docket 17-79;** and
Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap, **ET Docket No. 14-165**

Dear Ms. Dortch:

On July 25, 2017, General Counsel Melissa Slawson of GeoLinks (formerly California Internet), and Michele Farquhar of Hogan Lovells US LLP, counsel to GeoLinks, met with the Wireless Telecommunications Bureau (WTB) Deputy Bureau Chiefs Dana Shaffer and Suzanne Tetreault, Legal Advisor Mary Claire York, Deputy Division Chief Paul D'Ari, and Senior Counsel David Sieradzki, to discuss spectrum access and infrastructure issues facing fixed wireless Internet service providers (WISPs). On July 26, CEO Skyler Ditchfield joined the GeoLinks representatives noted above to discuss these issues in meetings with: (1) Chairman Ajit Pai, Media Advisor Alison Nemeth, and Law Clerk Jay Kaplan; (2) Commissioner Michael O'Rielly and Legal Advisor Erin McGrath; (3) WTB representatives Paul D'Ari and Suzanne Tetreault; and (4) Office of Engineering and Technology Chief Julius Knapp, WTB Chief Donald Stockdale and WTB Senior Deputy Chief Nese Guendelsberger.

During these meetings, GeoLinks provided details about the Company's business and rapid growth as a WISP in both urban and rural areas, originally in California, as highlighted in the attached materials provided at the end of the meeting. Leveraging its B2B success, GeoLinks has expanded its high-speed broadband offerings to reach schools and communities in rural parts of the state. To continue its efforts, the Company is seeking additional spectrum resources necessary to maintain its growth and its rural connectivity efforts. Specifically, the Company seeks the opportunity to acquire spectrum on a licensed or light-licensed basis.

The GeoLinks representatives expressed support for the Broadband Access Coalition petition to facilitate deployment of licensed point-to-multipoint fixed wireless broadband service in the 3.7-4.2 GHz spectrum band and the Commission's Notice of Inquiry on expanding flexible use of mid-band spectrum between 3.7 and 24 GHz. GeoLinks added that mid-band spectrum, especially in the 3.7-4.2 and 6-7 GHz bands, is well suited for point-to-multipoint use in rural areas because of the enhanced propagation characteristics and reduced vulnerability to interference from trees and other sources of interference common to rural terrain. In addition, the Company explained the challenge of operating on unlicensed bands such as 5 GHz, where overcrowding can slow and disrupt service. GeoLinks could provide better and more reliable service if the Company had access to licensed or lightly licensed spectrum in smaller geographic service areas more tailored to individual states.

The GeoLinks representatives noted that TV white space (TVWS) spectrum is also well suited for fixed wireless service in rural areas because it can travel long distances over mountainous and tree-filled terrain. If the Commission provides greater certainty regarding TVWS utilization in rural areas, then equipment prices will drop to a range needed to provide substantial utility to previously unserved or underserved rural communities.

In addition, the parties discussed the lengthy and burdensome approval process for installing wireless infrastructure on federal land. This process can prevent WISPs from reaching or efficiently serving many rural communities. For example, GeoLinks has been forced to build several sites around the circumference of federal land because it would have taken years to receive approval to deploy a single site on government property. GeoLinks encouraged the Commission to find ways to streamline federal siting practices and policies in its wireless infrastructure proceeding or through the Broadband Deployment Advisory Committee in order to facilitate the provision of broadband in previously unserved communities.

Finally, GeoLinks expressed concern that many wireless licensees have not deployed in rural areas, but have been unwilling to lease or partition these areas to other parties.

The Company supports incentives to encourage greater build-out and spectrum sharing in rural areas.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this letter electronically in the above referenced dockets. Please contact me directly with any questions.

Sincerely,

/s/ Skyler Ditchfield

Skyler Ditchfield
GeoLinks

cc: Chairman Ajit Pai
Commissioner Michael O'Rielly
Donald Stockdale
Julius Knapp
Nese Guendelsberger
Dana Shaffer
Suzanne Tetreault
Alison Nemeth
Erin McGrath
Mary Claire York
Paul D'Ari
David Sieradzki
Jay Kaplan

Attachments (2)

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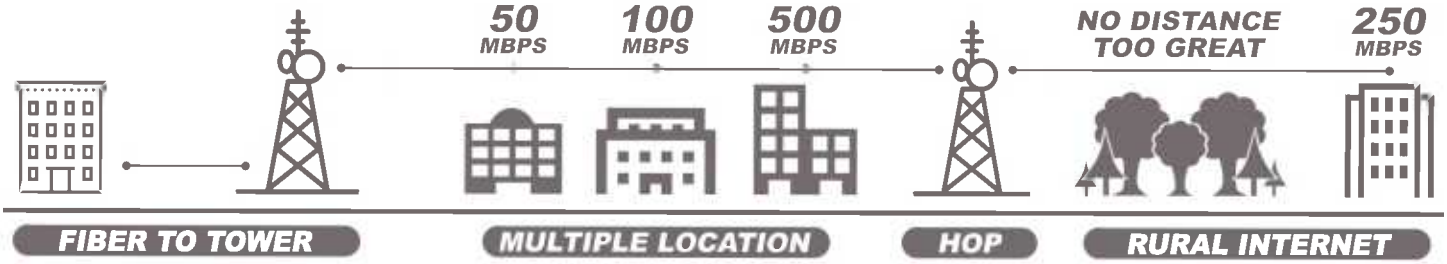

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